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\*ADMITTED IN NY & NJ

September 21, 2022

**BY ECF**

The Honorable Edgardo Ramos  
United States District Court  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

**Re: *United States v. Markin, et al*, 22 CR 395**  
**Seth Markin - Defendant**

Your Honor:

I write to request that the travel restrictions of the defendant's bond be modified to permit him to accompany a friend, Jamilia Kazimalava, on a trip to Asheville, North Carolina from November 1 through November 8, 2022.

**Background**

In or about November 3, 2021, the Government sought and obtained a warrant to search the room and locker where the defendant was residing as an FBI trainee in Quantico, Virginia. The warrant permitted the Government to seize the defendant's cell phone and to extract data relating to an investigation of alleged securities fraud.

In or about early November, the warrant was executed. Thereafter, the defendant was dismissed from his position as an FBI trainee and, the defendant moved to the home of his parents, Steven and Caryn Markin, in Washington Crossing, Pennsylvania.

From the date of the search until the present, the defendant has been aware that he was under investigation for charges of securities fraud. Yet, the defendant obtained other employment and has made no effort to absent himself from the authorities.

On July 21, 2022, the defendant was named in the instant Indictment. The Indictment charges him with conspiracy and substantive counts of Securities Fraud and Tender Offer Fraud based upon allegations that he misappropriated material non-public information relating to plans by Merck & Company, a publically traded pharmaceutical company, to acquire Pandion Therapeutics, a publicly traded biotechnology company; and, that the defendant purchased Pandion stock and encouraged others to do so based upon this information.

On or about July 25, 2022, the defendant was arraigned to the Indictment before this Court. He was released on an unsecured bond of \$200,000, co-signed by the defendant's parents. The defendant's travel is limited to the Southern District of New York, the Eastern District of New York, the District of New Jersey and the Eastern District of Pennsylvania. The defendant was required to disclose the nature of the instant offense to his current employer and provide verification that he done so.

The defendant has remained compliant with all of the terms and conditions of his bond.

#### **The Basis For The Instant Request**

The defendant requests a relaxation of his travel conditions which would permit him to accompany a friend, Jamilia Kazimalava and accompany him to Ashville, North Carolina, in order to attend a Tattoo Arts convention at that location. The defendant informs me that Ms. Kazimalava is a tattoo artist who lives and maintains a studio in Bensalem, Pennsylvania. If the Court grants the motion, the defendant intends to drive to Bensalem, Pennsylvania to meet Ms. Kazimalava and to drive her to the site of the convention in Asheville, North Carolina. Ms. Kazimalava will be a vendor at the convention. The defendant will help her to set up her booth, and participate with her in the activities of the convention. The convention runs from November 4 through November 6, 2022. Thereafter, the defendant will drive Ms. Kazimalava back to Bensalem and then drive home. In total, the trip will last from November 1 to November 8, 2022.

The defendant informs me that Ms. Kazimalava has no prior criminal record and was not involved in the trading of stock in Pandion Inc., which is the subject of the Indictment.

While the defendant is in Asheville, he will be staying at the Hilton Garden Inn. The hotel will be in close proximity to the location of the convention.

I have spoken with the defendant's Pretrial Services Coordinator, Janitza Gomez, and she informs me that she has no objection to this request.

**Conclusion**

For all the reasons set forth herein, we respectfully request that the defendant be permitted to make the trip described above.

Most respectfully,

/s/ Maurice H. Sercarz

cc: All Parties (by ECF)